

### **REMARKS**

This Application has been carefully reviewed in light of the Office Action mailed January 13, 2004. Claims 1-40 are pending in the application. Applicants have amended Claims 1, 16, 30, and 34. Applicants submit that no new matter has been added with these amendments. Applicants submit that the pending claims are patentably distinguishable over the cited references. Applicants, therefore, respectfully request reconsideration and favorable action in this case.

#### **Section 102 Rejection**

The Examiner rejects Claims 30-33 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent 5,684,800 issued to Dobbins, et al. ("*Dobbins*"). Applicants respectfully traverse this rejection and all assertions therein.

Amended independent Claim 30 recites, "a first port and a second port each including a receive-transmit pair (RTP), the RTP including a high-speed demultiplexer operable to process ingress traffic, a high-speed multiplexer operable to process egress traffic, and an interface to an external network connected to an internal network including the node, the first and second port associated with disparate network addresses." *Dobbins*, in contrast, merely teaches ports 1 and 3 for transmitting packets between the end systems 20A and 20C, respectively, and switch 11 and associated with the network address of switch 11. Col. 6, Lines 25-32. Accordingly, *Dobbins* fails to explicitly or inherently teach each and every limitation of Claim 30 and its dependents 31-33.

#### **Section 103 Rejection**

The Examiner rejects Claims 1-10, 12-29, and 34-40 under 35 U.S.C. § 103(a) as being unpatentable over *Dobbins* in view of U.S. Publication US 2003/0165140 to Tang, et al. ("*Tang*"). Applicants respectfully traverse this rejection and all findings therein for the following reasons.

Amended independent Claim 1 recites, "an identifier operable to represent the port group as a single element to disparate elements and associated with a single network address." *Tang*, in contrast, merely teaches a multicast VLAN identifier (MVLAN-ID) associated with multiple network addresses, not "a single network address." Additionally,

*Dobbins* fails to teach or suggest the missing element. Accordingly, Applicants respectfully request reconsideration and allowance of Claim 1.

Independent Claims 16 and 34 are allowable for analogous reasons. Claims 2-10 and 12-15 each depend from independent Claims 1 and are thus patentable over the cited art, for example, for at least the reasons discussed above with regard to Claim 1. Claims 17-29 depend from independent Claims 16 and are thus patentable over the cited art, for example, for at least the reasons discussed above with regard to Claim 16. Claims 35-40 each depend from independent Claims 34 and are thus patentable over the cited art, for example, for at least the reasons discussed above with regard to Claim 34. Applicants respectfully request reconsideration and allowance of these claims.

The Examiner rejects Claim 11 under 35 U.S.C. § 103(a) as being unpatentable over *Dobbins* in view of *Tang* as applied to Claim 10 above, and further in view of U.S. Patent 6,148,000 issued to Feldman, et al. ("*Feldman*"). Claim 11 depends from Claim 10 and is thus patentable over the cited art, for example, for at least the reasons discussed above with regard to Claim 10. Applicants respectfully request reconsideration and allowance of Claim 11.

**CONCLUSION**

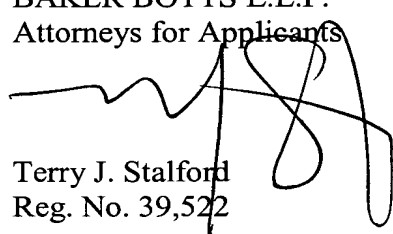
Applicants have made an earnest attempt to place this case in condition for allowance. For at least the foregoing reasons, Applicants respectfully request full allowance of all the pending claims.

If the present application is not allowed and/or if one or more of the rejections is maintained, Applicants hereby request a telephone conference with the Examiner and further request that the Examiner contact the undersigned attorney to schedule the telephone conference.

Although Applicants believe no fees are due, the Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

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